

Hazardous Waste Connection

Compliance Information for Generators in Kansas

Spring 1998

Vol. 2, No. 2

EMERGENCY!!! Are You Prepared?

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A Guide to the Essentials of a Contingency Plan

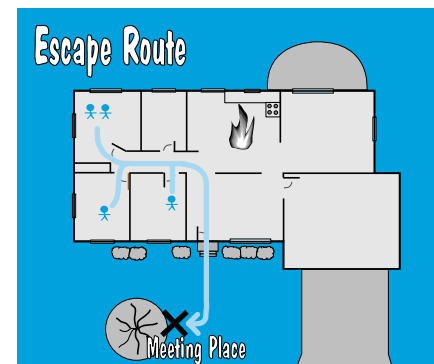
by Lynda Ramsey

If a fire, explosion, spill or other emergency happened at your business, would your employees know what to do? Would you? Would people get out safely? Would a spill be contained so that minimal environmental damage (and associated cleanup costs) would occur?

State and federal regulations require businesses who **generate or store** more than 2,200 pounds of hazardous waste to develop a Contingency Plan to use in an emergency. The Contingency Plan must outline actions that both on-site and off-site emergency personnel will take to minimize hazards to human health and the environment. The plan must be implemented immediately whenever an emergency occurs.

If you already have a Spill Prevention, Control and Countermeasures (SPCC) Plan, you can amend this plan to incorporate the hazardous waste contingency plan information. Your contingency plan should be reviewed frequently and revised whenever any information changes.

Your Contingency Plan must be included as part of your Personnel Training Program at your facility.



The essential elements a Contingency Plan should cover are:

- **physical description section** identifying your company name, site location, telephone number and a brief description of the facility (property size, number of buildings and type of business), directions on how to get to the facility for emergency responders, and a brief description of the hazardous waste(s) generated and the location where they are stored at the facility.
- **emergency contact section** identifying the names of the emergency and alternate coordinators, their addresses and phone numbers for both the office and home.
- **how to respond section** describing what actions the emergency coordinators and on-site personnel must take when implementing the contingency plan.

TIP: This section of the contingency plan must explain, in detail, all of the actions that the emergency coordinators and other on-site personnel will take in an emergency. It must also explain what actions the emergency response agencies, such as fire department, police or sheriff department, will take. **A plan that only tells people to call 911 is not sufficient.** The plan must thoroughly explain the responsibilities of the off-site emergency response agencies. For example: What gate or location on the property do you want them to enter the facility? Who do you want them to meet? What do you want them to do when they arrive? Are they familiar with the wastes or chemicals at your facility. If more than one hospital, fire or police department could respond, you need to identify the primary emergency authority. If you have contracted an environmental company to respond to the hazardous waste emergencies, you need to identify the company and state what agreements were made.

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Hazardous Waste Connection



**Kansas Department of Health &
Environment**

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By Bill Bider

With this issue of the *Hazardous Waste Connection* we are beginning our second year of publication. Our first four issues covered a variety of subjects selected to help hazardous waste generators better understand applicable regulations and avoid compliance problems. Some major subjects included: preparing for an inspection; automotive service and repair shop waste management practices; how to determine if wastes are hazardous; open container problems; and common hazardous waste violations. In this issue, we focus on contingency plan requirements and used oil combustion in small space heaters.

Although we have received some feedback from the public, we would like to hear more from you regarding the value of this newsletter. Is it meeting your needs? Would you like to see any changes made? Is it too short? Are there certain subjects which you would like to see addressed? Our goal is to provide readers with brief and focused articles of widespread interest to the thousands of hazardous waste generators in Kansas.

Please take a few minutes to let us know your opinions, whether positive or negative. We would be pleased to receive a message of any kind via letter, telephone call, FAX (785/296-8642), or E-mail (pfunk@kdhe.state.ks.us). Our individual phone numbers and address are listed in this issue. Thank you in advance for helping us provide a newsletter which meets the needs of hazardous waste generators throughout Kansas.

Contingency Plan (Continued)

- **emergency equipment section** listing all of your emergency equipment, a physical description of each, where it is located, and a brief outline of its capabilities;

TIP: *This information must be explained, in detail. For example: ABC Fire Extinguishers are located throughout the facility and each location is designated with markings on the wall. The locations are also identified on the facility map in Section 8 of this contingency plan. The portable extinguishers contain specific material for putting out small wood fires, electrical fires, or chemical fires.*

- **emergency evacuation routes section** identifying the emergency and alternate evacuation routes from all areas that generate or store hazardous waste. This section must include a written description describing the emergency signal(s) used to signal an evacuation. The routes should be drawn on a map of the buildings and property.

Copies of the contingency plan and all revisions must be maintained at your facility and copies submitted to all local police or sheriff departments, fire departments, hospitals, and State and local emergency response teams.

TIP: *In order to document that you have supplied a copy of this plan to the outside response agencies and the hospital, we suggest you keep a signed letter from them in your files stating they have received your plan.*

We will provide you with a copy of a generic contingency plan if you request one. This generic plan, when properly completed, will meet the minimum requirements for a contingency plan as outlined in the hazardous waste regulations.

If you have any questions regarding Contingency Plan requirements, please feel free to call KDHE at (785) 296-0681 or your district office.

Workshops on Hazardous Waste Regulations and Small Businesses

KDHE is sponsoring 8 workshops across the state to discuss hazardous wastes regulations. The workshops will focus on the requirements for Kansas Generators and Small Quantity Generators and be held during evening hours to accommodate small business owners and operators. The workshops will be free and attendees can remain anonymous. This is your opportunity to come and ask questions of the people who make the regulatory compliance decisions. If you have any questions or just want to learn more about hazardous waste and used oil requirements, please plan to attend the workshop at the location nearest you.

April

- 9 Student Union Conf. Rm, Seward Co. Comm. College, 801 N Kansas Ave, Liberal, KS
- 14 Business Occupation Center, N. C. KS Tech. College, 2205 Wheatland Ave, Hays, KS
- 15 Dining Rm A&B, Cloud Co. Health Center, 1100 Highland Drive, Concordia, KS
- 16 Bellevue Golf & Country Club, 18011 Country Club Rd, Atchison, KS
- 21 Clymer Rm, Bradford Memorial Library, 611 S. Washington, El Dorado, KS
- 22 Fireside Rm, Independence Comm. College, College Ave & Brookside Dr, Independence, KS

May

- 5 Flint Hills Rm, Emporia State University, 1200 Commercial, Emporia, KS
- 6 Miller Library, McPherson College, 1600 E. Euclid, McPherson, KS

All sessions will be held from 7- 9:45 pm. For more information, call (785) 296-1591 or FAX (785) 296-8642.



Oil Fired Space Heaters and the New “Used Oil” Regulations

By Ron Smith

New regulations covering the generation, storage, transportation, recycling and disposal of used oil will take effect in the fall of 1998. This and one or more future issues of the “*Hazardous Waste Connection*” will explain how these new regulations may impact you and your business.

If you use an oil fired space heater in your business, these new regulations may affect you. Over the last few years, we have received many questions on used oil as more and more businesses look for ways to recycle or dispose of this common waste. The space heaters that are designed burn used oil are very efficient and come in various sizes depending on the area that you are trying to heat. The new requirements for oil fired space heaters include: (1) a maximum capacity of not more than 0.5 Btu per hour, and (2) the combustion gases must be vented to the outside of the building. Most oil fired space heaters being sold commercially will meet these requirements, however, you should insure that the unit you are considering buying will meet these standards.

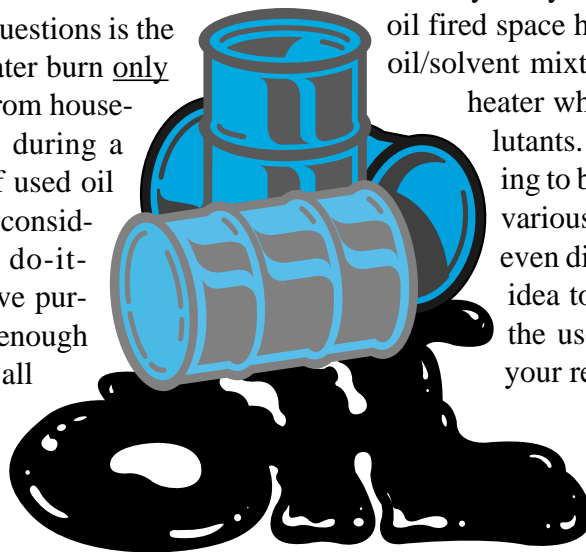
The area that has raised the most questions is the requirement that the oil fired space heater burn only used oil that is generated on-site or is from household do-it-yourselfers. Farmers who during a month generate less than 25 gallons of used oil from farm machinery and vehicles are considered to be the same as household do-it-yourselfers. Some businesses that have purchased these heaters do not generate enough used oil keep their heaters in operation all winter. To supplement their fuel supply, they have taken used oil from other businesses. However, *the owner of the oil fired space heater can only accept (untested) oil generated off-site from do-it-yourselfers*. This requirement may seem overly restrictive but there are good reasons for this position. The used oil fired space heaters are designed to burn used oil; not solvents, anti-freeze, brake fluid, gasoline, etc. that could be mixed in with the used oil from various businesses. Without testing, the owner cannot be certain that used oil from a business is uncontaminated, however, you can be relatively confident that the oil from a homeowner is not mixed with any other contaminants.

There is one other opportunity to obtain used oil for use in the space heater under these regulations. If the used

oil is determined to be “**on-spec**” **used oil**, then the new regulations do not apply and the used oil can be burned in a space heater. However, in order make this determination, the oil must be analyzed for flash point, total halogens and four heavy metals (arsenic, cadmium, chromium, lead). If the oil does not exceed the levels established for these constituents, then the oil is “on-spec”. These levels are showned in the table below.

Used Oil Specifications

Max Constituent Allowable Levels	
Arsenic	5 ppm
Cadmium	2 ppm
Chromium	10 ppm
Lead	100 ppm
Total Halogens	1,000 ppm
<hr/>	
Flash Point	100° F min



By analyzing the used oil, the operator of the oil fired space heater is protected from receiving a oil/solvent mixture that may actually blow up the heater when burned or release toxic air pollutants. Used oil that is determined by testing to be “on-spec” can be purchased from various used oil processors, rerefiners or even directly from generators. It is a good idea to request a copy of the analyses of the used oil that you are purchasing for your records.

In summary, these new regulations place requirements on using oil fired space heaters and used oil as a fuel source. Oil fired space heaters can only burn oil generated at the facility, oil from do-ityourselfers, or oil that is determined be “on-spec”. These regulations are in place to help protect the owner by insuring that they burn only used oil the heater is designed to burn.

The storage of used oil for use in an oil fired space heater is also regulated and will be covered in a later issue of this newsletter. Other topics to be covered in future articles will be the requirements for used oil generators, storage, transporters, processors and practices which are considered to be illegal disposal. If you would like a copy of the new used oil requirements, please call (785) 296-1591.

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ADDRESS CORRECTION REQUESTED

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Mark Duncan 785/296-1614
Lynda Ramsey 785/296-0681
KDHE - District Office Inspectors/Engineers
Northeast - Lawrence 785/842-4600
Southeast - Chanute 316/431-2390
North Central - Salina 785/827-9639
South Central - Wichita 316/337-6020
Northwest - Hays 785/625-5663
Southwest - Dodge City 316/225-0596
EPA RCRA Hotline (800) 424-9346

KDHE Public Advocate 785/296-0669
toll free for long distance (800) 357-6087

Kansas State University (KSU)
Pollution Prevention Institute/Small Business
Environmental Assistance Program (SBEAP) 785/532-6501

University of Kansas (KU)
SBEAP - Resource Library 785/864-3968
SBEAP - Hot Line (800) 357-8898

BWM Fax 787/296-8642
email pfunk@kdhe.state.ks.us

HOW MAY WE DIRECT YOUR CALL....
EPA ID numbers David Branscum
Compliance Assistance Outreach Program Mary Bitney
General HW Generator questions Ron Smith
Groundwater Monitoring Mark Duncan
HW Complaints Lynda Ramsey or Ron Smith
HW Notification questions David Branscum
HW Permits Mostafa Kamal
HW Regulation information .. John Mitchell or George McCaskill
HW Transporter Registration information Linda Prockish
PCB, TSCA and/or CERCLA George McCaskill